

From: [CC Grisham](#)
To: [Tzhone, Stephen](#)
Cc: [Charles Curtis Grisham Jr.](#); [Hovis, Jennifer](#); [Mccarthy, Gina](#); [Meiburg, Stan](#); [Reynolds, Thomas](#); [Smith, Roxanne](#); [Hart, Daniel](#); [Lesperance, Twanna](#); [Cuscino, Glen](#); [Blumenfeld, Jared](#); [Strauss, Alexis](#); [Zito, Kelly](#); [McIlwain, Serena](#); [Manzanilla, Enrique](#); [Ragon, Derek](#); [Sanchez, Carlos](#); [Curry, Ron](#); [Coleman, Sam](#); [Edlund, Carl](#); [Perciasepe.bob@Epa.gov](#); [Kyle.Weaver@mail.house.gov](#); [tom_cotton@cotton.senate.gov](#)
Subject: EPA Site Progress Profile Upgrade: WASTE OF TAXPAYER RESOURCES
Date: Wednesday, October 07, 2015 8:56:31 PM
Attachments: [admin records.pdf](#)
[ATT00001.htm](#)
[AR landing.pdf](#)
[ATT00002.htm](#)
[clickthrough publicly available docs.pdf](#)
[ATT00003.htm](#)
[landing page.pdf](#)
[ATT00004.htm](#)
[site info for Arkwood.pdf](#)
[ATT00005.htm](#)
[staying informed.pdf](#)
[ATT00006.htm](#)
[FINAL ppt Compare websites for Koppers Oroville to Arkwood copy.pdf](#)
[ATT00007.htm](#)
[TO ST - Item for part V improvements suggested.pdf](#)
[ATT00008.htm](#)
[Item for part V improvements suggested.pdf](#)
[ATT00009.htm](#)
[Superfund Sites Region 9 Superfund US EPA.pdf](#)
[ATT00010.htm](#)

Dear Stephen:

Overall Problem (website-wide, Agency-wide): After years of delay and incalculable cost to the public, EPA or its contractor has produced nothing more than a redesigned splash page (containing false information that at least was correct in the old Site Progress Profile) as a bolt-on front-end to the same old, out-of-date, moribund, misleading, confusing, archaic, technically inferior and incomplete Superfund Site information systems that have existed for over two decades.

How I stumbled into the “new” Arkwood site:

- 1) Type in URL (www.epa.gov/superfund/arkwood) listed in the red box on Arkwood’s May 2015 “Site Status Summary;”
- 2) Redirected to <http://www2.epa.gov/superfund> which is the general Superfund splash page;
- 3) Manually added (as experiment) “/arkwood” to the redirect URL in 2) above to form <http://www2.epa.gov/superfund/arkwood> and hit enter;
- 4) Redirected to <http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0600124> “new” site splash page, actually the old “cumulis” site, badly repurposed.

Specific Problems (Arkwood):

- a) Landing page at <http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0600124> (attachment “landing page”) states incorrectly “Site-Wide Ready for Anticipated Use? No”;
- b) From landing page at <http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0600124> clicked on “EPA’s Involvement at this Site” link (http://cumulis.epa.gov/supercpad/cursites/dsp_ssppSiteData1.cfm?id=0600124#Why) and found minimal and incomplete information e.g. under “What’s being done to protect human health and the environment?” there is big white blank space;



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c) "Administrative Records" link (<http://semspub.epa.gov/src/docs/showcollections.jsf?faces-redirect=true&epaid=ARD084930148&collectionType=AR>): lands on arcane page titled "Superfund Records Collections Home - Region: 06 Collection Type: Administrative Records EPA ID: ARD084930148" with single tiny hypertext link (text "ESD" links to <http://semspub.epa.gov/src/collection/06/AR1765>); incomprehensible to members of public; should go directly to complete AR page;

d) Administrative Record page (<http://semspub.epa.gov/src/collection/06/AR1765>) contains an index from 1995 and eight (8) documents, all over twenty (20) years old; content out-of-date and incomplete e.g. no ROD, Support Document, etc.;

e) Additional Reports and Documents link (<http://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.scs&id=0600124>) goes to page titled "Administrative Records for ARKWOOD, INC." I would expect the "Administrative Records" link to lead here;

f) "Administrative Records for ARKWOOD, INC." page at <http://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.scs&id=0600124>) contains six tabs; page lands defaulting on the first tab titled "Additional Site Documents;" this page requires viewer to click yet another link (<http://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.scs&id=0600124&doc=Y&colid=32133>) titled "PUBLICLY AVAILABLE DOCUMENTS";

g) "PUBLICLY AVAILABLE DOCUMENTS" tab/sub-page at <http://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.scs&id=0600124&doc=Y&colid=32133> contains only three "Additional Site Documents" (past three Five-Year Reviews); this content scanty and incomplete;

h) "PUBLICLY AVAILABLE DOCUMENTS" page at <http://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.scs&id=0600124&doc=Y&colid=32133> has six tabs, as mentioned in f) above; other tabs besides "Additional Site Documents" are: "Other Names," "Site Contacts," "Contaminants of Concern," "Operable Units" and "Administrative Records"; these pages are all part of the legacy cumulis.epa.gov Site Progress Profile site and are not new at all, as follows:

"Other Names" tab displays link (http://ofmpub.epa.gov/apex/cimc/f?p=CIMC:73:0::NO::P71_IDSEARCH:SF_SITE_ID|0600124) titled "Map of the site location displaying the EPA Region, state, county and latitude/longitude of the site" but none of the advertised data are displayed on clickthrough page, just a Bing map of the general area;

"Site Contacts" tab of f) above displays "Remedial Project Manager (RPM) Ruben Moya (214) 665-2755; to my understanding Mr. Moya no longer has anything to do with Arkwood; your email address is missing;

"Contaminants of Concern" tab of f) above does not provide ATSDR Profile links for Dioxins/Dibenzofurans or for Base Neutral Acids;

"Operable Units" tab of f) above displays "SITEWIDE - No Contaminants - No Cleanup

Technologies”;

“Administrative Records” tab of f) above displays a link to c) above; this tab requires two (2) more non-intuitive clicks to obtain just those eight (8) documents and “Index of Documents,” all of which are more than twenty (20) years old; information out-of-date and incomplete;

Please note:

I consider this botched launch of the “new information system, the Superfund Enterprise Management System (SEMS)” an actionable waste of taxpayer resources and a grave abdication by the government of its legal responsibilities to the public for providing this vital information and husbanding public resources wisely.

The contractor and/or staff who responsible for this phony, years-delayed “relaunch” should be dismissed and held responsible for serious under-delivery if not outright fraud.

As I have previously stated and repeated, the legacy “Site Overview” for Koppers Co., Inc. (Oroville Plant) Superfund Site (EPA ID CAD009112087) in EPA Pacific Southwest Region 9 (still found at <http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/bysite/koppers%20co.%2c%20inc.%20%28oroville%20plant%29?opendocument>) was and still is the model of excellence in Superfund Site reporting and transparency.

Please see my August 23, 2013 email to you with a carefully-prepared slideshow I had created to illustrate my opinion, intended for use with my agenda for our meeting that year (PDF of that email and slideshow attached here.)

I later reiterated and amplified my opinion. Please see my email to John Meyer of April 14, 2014 (attached as PDF,) again asking for focus on this issue, with copies to the following EPA staff: tzhone.stephen@epa.gov, Ragon.Derek@epamail.epa.gov, sanchez.carlos@epa.gov, curry.ron@epa.gov, Coleman.sam@Epa.gov, Edlund.carl@Epa.gov, mccarthy.gina@epa.gov, Perciaspe.bob@Epa.gov.

I tried once more to bring focus to this sorry state of affairs. Please see my detailed email of July 24, 2015 to Jennifer Hovis (attached as PDF) with copies to the following EPA staff: mccarthy.gina@epa.gov, Meiburg.stan@Epa.gov, Reynolds.thomas@Epa.gov, Smith.roxanne@Epa.gov, hart.daniel@epa.gov, lesperance.twanna@epa.gov, cuscino.glen@epa.gov, Blumenfeld.jared@Epa.gov, Strauss.alexis@Epa.gov, Zito.kelly@Epa.gov, McIlwain.serena@Epa.gov, Manzanilla.enrique@Epa.gov.

Shockingly, when I now use the search engine linked on the Superfund home page by the “Sites where you live” hypertext link (<http://www2.epa.gov/superfund/search-superfund-sites-where-you-live>) to find the paragon Koppers Oroville reporting website, that former legacy “Site Overview” has been replaced by the very expensive useless front-end splash page that purports to be an upgrade to the previous reporting system (<http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0901135>)

Most distressing of all, the page now facing the public as result of searching “Oroville” in “Search for Superfund Sites Where You Live” — which page has replaced the robust, thorough and complete legacy “Site Overview” for Koppers Oroville — actually states: “Site

Reports and Documents - No published Administrative Record documents currently available
- No published Special Collection documents currently available.”

On this same page, as a saving grace likely inserted by Region 9 to assist the public, there is the placeholder message under “Topics In Focus”:

”EPA is in the process of updating this site profile page with additional current information. Until this update is complete, please [click here](#) for additional information about this site and to view site documents. Thank you for your patience.”

However, I am completely out of patience with the government’s ability to bring this "new information system, the Superfund Enterprise Management System (SEMS)" project to fruitful completion.

I am contacting Arkansas' representatives to the United States Congress to complain about this galling waste and disservice to the public, perpetrated by EPA.

There needs to be accountability at EPA for such poor performance, as there would be in the private sector at a healthy corporation.

At EPA, waste, incompetence and poor performance are not only tolerated, they are rewarded and perpetuated, at least in this case.

Sincerely,

Curt